

## EXECUTIVE SUMMARY

MEMORANDUM FOR DC

THROUGH: DCMDE-H

FROM: DCMDE-HH  
Prepared by: DCMDE-HH/4050  
July 20, 1998

SUBJECT: DCMDE Hazard Communication Program

### DISCUSSION:

- 29 CFR 1910.1200, the OSHA Hazard Communication Standard, requires employers to inform employees about the potential hazards of chemicals in the workplace and appropriate protective measures.
- A key requirement of the Standard is development and implementation of a written hazard communication program.
- DODI 6050.5, DoD Hazard Communication Program, requires DoD components to comply with the OSHA standard specified above.
- The attached memorandum would meet the requirement for a written program.

RECOMMENDATION: DC sign the memorandum.

COORDINATION: DCMDE-HH\_\_\_\_HD\_\_\_\_FA\_\_\_\_OAS\_\_\_\_OTDT\_\_\_\_  
NAGE R1-210\_\_\_\_AFGE 1906\_\_\_\_NFFE 75\_\_\_\_

DCMDE-HH

MEMORANDUM FOR DISTRIBUTION AAA

SUBJECT: DCMDE Hazard Communication Program

Providing a safe and healthful workplace is a command responsibility. Part of this responsibility is Hazard Communication: informing employees about the potential hazards of chemicals in the workplace and related protective measures.

The attachment details how we are implementing Hazard Communication in this district. Essentially, managers, supervisors, and individual employees play parts consistent with their positions; DCMDE-HH has overall program responsibility and is the primary source of consultation and training materials.

If you have any questions about our Hazard Communication Program, please direct them to Mr. J. Lark, (617) 753-4041.

/S/

WILLIAM P. DONALDSON  
LtCol, USAF  
Chief of Staff

Attachment

# DCMDE

## Hazard Communication (HAZCOM) Program

### REFERENCES.

- a. 29 CFR 1910.1200, OSHA Standard for Hazard Communication
- b. DODI 6050.5, DOD Hazard Communication Program

### PURPOSE.

Promulgate the written plan for DCMDE Hazard Communication, per references a. and b., to codify how DCMDE employees are informed about chemical hazards in the workplace.

### DEFINITIONS.

A **chemical** is an element, chemical compound, or mixture of elements and/or compounds.

A **container** is any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.

**Exposure** or **exposed** means that an employee is subjected to a hazardous chemical in the course of employment, by any route of entry (inhalation, ingestion, skin contact or absorption, etc.). Exposure may be **potential**; that is, not actually happening, but possible.

**Generic training** is education encompassing the basic principles of hazardous material recognition, control, and management; that is, principles applying to all hazardous materials, regardless of kind or location.

A **hazard warning** is an admonition in the form of words, pictures, symbols, or combination thereof, appearing on a label or sign, summarizing specific physical and health hazard(s), and itemizing target organ effects of chemical(s) in a container or in an area.

A **hazardous chemical** is a substance which is a health hazard or a physical hazard.

A **hazardous chemical inventory** is the list of hazardous chemicals known to be present in a work area. Each item has a unique identifier, either a name or number, which ties the item to the particular material safety data sheet also marked with that identifier.

A **health hazard** is a chemical which may produce acute or chronic health effects in exposed employees. The chemicals would include carcinogens, toxic agents, irritants, corrosives, sensitizers, and agents which damage the lungs, skin, eyes, or mucous membranes.

A **material safety data sheet (MSDS)** is a written and/or electronic document which informs the reader about the properties of a hazardous material, potential harmful effects, and appropriate protective measures. (Please see COMMUNICATIONS MEDIA for a fuller discussion of MSDSs.)

A **permissible exposure level (PEL)** is a time-weighted average amount of a hazardous material, expressed in terms of parts per million (ppm) or milligrams per cubic meter (mg/m<sup>3</sup>), to which one may be exposed without harmful effects.

A **physical hazard** is a chemical which may be a combustible liquid, a compressed gas, an organic peroxide, or an oxidizer, and which may be characterized as explosive, flammable, pyrophoric, unstable, or water-reactive.

**Site-specific training** is education focused on particular chemicals, or kinds of chemicals, present at a particular workplace, including information on detection, the physical and chemical hazards, procedures for protecting self, and details as to how the local hazard communication program works.

**Work areas** would include DCMC office spaces as well as contractor plants.

## COMMUNICATIONS MEDIA.

a. **DCMDE Written Hazard Communication Program.** This document is the written plan for bringing Hazard Communication to DCMDE, and is itself one of the communications media.

b. **Videotape Library.** DCMDE-HH maintains a collection of commercially produced videotapes about hazard communication. On request, these tapes will be loaned to DCMC offices, and they will travel to/from the offices via Certified Mail with return receipts.

c. **Booklets.** DCMDE-HH maintains a supply of commercially produced, highly readable booklets on hazard communication, and the intent is that every employee in the District should have a personal copy of the booklets.

d. **Container Labels.** Labels on containers of hazardous materials identify the materials within, and show hazard warnings appropriate for employee protection. To be "appropriate," a hazard warning must be recognized and understood by all employees; it may use words, colors, numbers, symbols, graphics, and icons. Ordinarily, manufacturer labels will provide appropriate hazard warning. However, IAW reference b., if DCMC personnel need to replace damaged/missing labels, they shall use DD Forms 2521 and 2522. These forms, which are self-sticking labels, may be obtained through the Supply System. The stock numbers are, respectively, **7690-01-342-4850** and **7690-01-342-4849**.

e. **Material Safety Data Sheet (MSDS).** Such a document provides detailed information about a chemical, its hazards, and prudent precautions for self-protection. A MSDS is required for **each** hazardous chemical used in the workplace. MSDSs shall be readily accessible to employees in their work areas during each work shift. MSDSs may be either paper or electronic, and accessible by way of either 3-ring binders or computer workstations.

## POLICY.

Whenever a DCMDE employee's duties entail potential exposure to chemical hazards in the workplace, the employee shall be informed about the nature of the hazards and about the measures to use to protect self. Employees shall receive information by a variety of means, including labels and other forms of warning, MSDSs, inventories, and generic/specific training. When potential exposure exists at a contractor facility, employees are expected to participate in the site-specific HAZCOM training of the contractor, to comply with the protective measures in effect at the facility, and to respect the confidentiality of any proprietary information. Employees, their designated representative(s), or other government officials shall have immediate access to this plan.

## INFORMATION and TRAINING.

- a. Under this Program, employees are to be **informed** of the following:
  - All contents of this instruction.
  - Assignments of theirs which will involve hazardous chemicals.
  - The location(s) of hazardous chemical list(s) and the related material safety data sheets.
- b. Under this Program, employees are to be **trained** as to the following:
  - Means for detecting the presence or release of a hazardous chemical in a work area (for example, odor, visibility, or the signal of a detection device).
  - The nature of the physical and health hazards of the chemicals in the work area.
  - The work practices, personal protective equipment, and routine/emergency procedures to use to protect self.
  - Use of labels and MSDSs to determine protective measures.
- c. Information and training shall be delivered when employees are initially assigned to work areas and whenever new physical or health hazards, which have not been explained previously, appear in those areas.
- d. When **few** chemicals are involved, **each** chemical shall be discussed in relation to detection means, nature of hazards, labels and MSDSs, and self-protection. When **many** chemicals are involved, discussion may be by **category**; that is, materials may be grouped as flammables, or corrosives, or asphyxiants, and so on, and discussed as such.
- e. The media outlined in the COMMUNICATIONS MEDIA section of this instruction shall be used to meet INFORMATION AND TRAINING requirements. These requirements shall also be met if an employee (for example, an Industrial Specialist, a Quality Assurance Representative, a Transportation Clerk, a Traffic Management Specialist, etc.) is selected for, and successfully completes, DCMDE-OTPT hazardous materials training courses HMF-4H and/or HMA-2D.

## RESPONSIBILITIES.

- a. **All Personnel.**
  - Become familiar with this program, as appropriate to your duties. New employees shall meet this requirement within one month of assuming their duties.
  - Read hazard warning labels, and supplement label information by referring to pertinent MSDSs.
  - Seek relevant consultation and advice from DCMDE-HH.
- b. **In-Plant Representatives.**
  - Be alert to the chemical hazards in containers and pipes, but also to the chemical by-products of work processes (fumes, dusts, mists, etc.).
  - Attend site-specific training provided by contractor(s), as prearranged by the cognizant supervisor.

c. **Supervisors.**

- Ensure that all supervised employees read/understand this instruction.
- Ensure that all supervised employees who work with, or in the vicinity of, hazardous chemicals receive training pertinent to those chemicals and related protective measures. (This includes site-specific Hazard Communication training provided by contractors.)
- Meet the requirements of the Information and Training section of this instruction for all tasks involving hazardous chemicals, whether the tasks are routine or new, and especially if they are **non-routine**.

d. **Safety Monitors.**

- Maintain a current copy of this instruction.
- Maintain the MSDSs for the hazardous chemicals (correction fluid, copier toner, multi-purpose cleaner, etc.) used in DCMC operations.
- Maintain a list of all hazardous chemicals on hand at the DCMC office, and update it at least annually.
- Make this instruction, any MSDS, and the hazardous chemical list available for review/duplication, as needed.
- Ensure that all DCMC in-facility hazardous material containers are labeled as to contents and their physical/chemical hazards.
- Use only manufacturer information on hazardous material labels.
- Post the emergency phone number of the local Poison Control Center.
- Retain HAZCOM training records for 5 years following the end of the fiscal year to which they relate.

e. **Safety Committee.**

- Assist in the management and control of hazardous chemicals at the DCMC, considering all purchase requests for hazardous chemicals, and determining whether or not a material will be purchased.

f. **Management Support Personnel.**

- Ensure that purchase orders for hazardous chemicals include a requirement for pertinent MSDSs.
- Ensure that for each hazardous chemical **received** there is an MSDS. If the MSDS is missing, do not accept the shipment.
- Forward the MSDSs to the Safety Monitor for retention.

- Ensure that each hazardous chemical ***received*** is labeled with the identity of the chemical, its trade name, appropriate hazard warnings, and the manufacturer's name and address. If containers are not properly labeled, do not accept the shipment.
- Ensure that each hazardous chemical ***shipped*** is labeled in conformance to the pertinent MSDS, and to USDOT and USPS requirements. Ship a copy of the MSDS with the container.
- Inform contractors about to begin construction operations in the DCMC office of chemical hazards which may be encountered in work areas, at least 30 days prior to the beginning of operations. Provide to each contractor a copy of this instruction, and copies of MSDSs as needed.
- Require from each of these contractors a copy of its written Hazard Communication program and of MSDSs for hazardous chemicals to be used in the DCMC office, at least 30 days prior to the beginning of construction operations.

g. **Commanders.**

- Issue local policy expressing the expectation that this instruction will be fully and effectively implemented.
- Appoint the Safety Monitor in writing as the holder of the hazardous materials inventory and the MSDSs.
- Involve the Safety Committee in the management and control of hazardous chemicals at the DCMC.

h. **DCMDE-HH.**

- Act as Program Manager for DCMDE Hazard Communication.
- Provide hazardous material consultation to field activities on request.
- Review local program implementation via oversight inspections.
- Have charge of the Communications Media available at District Headquarters.
- Assess program status annually and update/revise as needed.

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